

REMARKS

Claims 1-30 are pending in this application. Claims 1, 2, 11, 12, 21 and 22 have been amended.

At paragraphs 3 through 3-4, the Examiner objects to the specification because of a number of informalities. The Applicant amends the specification to correct those informalities. Accordingly, those objections should be withdrawn. No new matter has been added.

At paragraph 5, the Examiner rejects claims 21-30 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Applicant traverses this rejection, but amends claim 21 to expedite prosecution. As amended, claim 21 recites "A target computing environment comprising:" rather than "In combination:". Claims 22-30 depend from amended base claim 21. Accordingly, those rejections should be withdrawn.

At paragraph 7, the Examiner rejects claims 21-30 under 35 U.S.C. 101 because the inventions as disclosed in the claims are directed to non-statutory subject matter. The Applicant traverses this rejection, but amends claim 21 to expedite prosecution. Claim 21 is amended to recite "A target computing environment comprising:" rather than "In combination:". Claims 22-30 depend from amended base claim 21. Accordingly, those rejections should be withdrawn.

At paragraph 8, the Examiner claims 1, 2, 11, 12, 21 and 22 because there is no period at the end of those claims. Those claims have been amended to include a period at the end of each claim, so those objections should be withdrawn.

At paragraph 10, the Examiner rejects claims 1-9, 11-19 and 21-29 under 35 U.S.C. 102(b) as being anticipated by Arakawa et al., "SH4 RISC Multimedia Microprocessor," IEEE Micro, Volume 18, Issue 2, March-April 1998, pages 26-34 (hereinafter "Arakawa"). The Applicant traverses these rejections. In particular, the applicant respectfully submits that the claimed invention is well distinguished from the disclosure in Arakawa and that the claim amendments assist in further re-enforcing the differences between the claimed invention and Arakawa.

The following arguments address the Examiner's rejection of claims 1 – 9. However, in light of the Examiner's rejections at numbered paragraphs 10–10 and 10–11, the Applicant

respectfully submits that the following observations apply equally to the independent claims 11 and 21, and their dependent claims. Therefore the applicant respectfully submits that claims 1, 11 and 21 are allowable as they are not taught by Arakawa. The dependent claims are allowable at least because they depend from an allowable main claim.

The Examiner asserts that Arakawa discloses all the features of claim 1. The Applicant respectfully disagrees for at least the following reasons. Arakawa discloses a multi-media microprocessor that runs program instructions on the subject machine. Claim 1 recites “a method ... of emulation of program instructions for a subject machine on a target machine.” Hence, as Arakawa only discloses running a subject code on a subject machine, it does not anticipate claim 1. Furthermore, the method of claim 1 as amended involves the production of intermediate values, and testing the intermediate values for whether or not the target hardware has enough precision to finish the calculations without loss of accuracy.

The Examiner cites Arakawa page 33, left column, paragraph 4 as teaching each of the limitations of claim 1. This paragraph concerns the double-precision emulation of the SH4 device, and does not teach or suggest another machine, nor does it teach or suggest intermediate values. Arakawa further discloses that, “in the double precision mode, the current single precision instructions are treated as double-precision instructions.” (page 33, left column, paragraph 3). The disclosure of Arakawa is clearly inconsistent with the requirements of new claim 1. Since Arakawa does not teach or suggest all of the requirements of claim 1, that rejection is improper and should be withdrawn.

Arakawa teaches the use of a double precision mode in which all instructions are processed as double precision instructions regardless of the precision required for each individual instruction.

In contrast, amended claim 1 involves running subject code on a target machine, and testing of intermediate values to determine if the hardware of the target machine has enough precision to finish the calculation without loss of accuracy.

Arakawa provides teachings that lead away from any comparable testing of intermediate values. Furthermore, none of the other citations Trissel, Markstein, Dulong and Kelley mentioned in numbered paragraph 12 of the Office Action provide any teaching relevant to this feature. There is no motivation for the person of ordinary skill to adapt the teachings of Arakawa

to arrive at the method of claim 1, and even if such a combination were made it would not provide all the elements of the amended claim 1. Thus, the Applicant respectfully submits that neither Arakawa nor the other cited documents, alone or in combination, teach or suggest all of the limitations of claim 1.

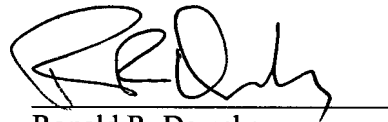
The same observations apply equally to the amended claims 11 and 21; the Applicant respectfully submits that this application is now allowable as amended claims 1, 11 and 21 are novel and inventive over the cited prior art.

No fees are believed to be due in connection with the filing of this response, however the Commissioner is authorized to debit Deposit Account No. 08-0219 for any required fee necessary to maintain the pendency of this application.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'R. Demsher', written over a horizontal line.

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